

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

AT&T INC. AT&T SERVICES, INC., AT&T  
MOBILITY, LLC, and AT&T CORP.,

*Defendants.*

Civil Action No. 2:23-cv-00397-JRG-RSP

**JOINT MOTION TO FOR EXTENSION OF TIME TO FILE RESPONSE AND  
REPLIES FOR PENDING MOTIONS**

Plaintiff Headwater Research LLC (“Headwater”) and Defendants AT&T Inc., AT&T Services, Inc., AT&T Mobility, LLC, and AT&T Corp. (collectively, “AT&T”) (collectively, the “Parties”) respectfully file this Joint Motion for Extension of time to File Response and Reply for Pending a Motions and would show the Court as follows:

The current deadline for Headwater to respond to AT&T’s Motion for Sanctions Under FRCP 37(e)(1) (AT&T Dkt. 118) is April 8, 2025. At this time, the Parties request a brief adjustment of the briefing schedule and request an extension of AT&T’s reply deadline to April 21, 2025.

Additionally, the current deadline for AT&T to reply to any of their motions for summary judgment and motions to strike expert testimony, including *Daubert* motions, is April 23, 2025. At this time, the Parties request a brief extension of the due date of AT&T’s replies to April 30, 2025.

The Parties request a brief extension of the above deadlines to align the briefing schedules

of the Motions for Sanctions and to avoid unnecessary conflicts between the briefing schedules for the Motions for Sanctions and the dispositive motions and motions to strike expert testimony.

The Parties represent that this Motion is not filed for the purposes of delay but rather so that justice may be served. The Parties have corresponded and are jointly seeking the relief sought in this Motion.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion.

Dated: April 4, 2025

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**CERTIFICATE OF CONFERENCE**

I hereby certify that, on March 28, 2025, counsel for AT&T conferred with counsel for Plaintiff and that this Joint Motion is unopposed.

/s/ Nicholas Mathews  
Nicholas Mathews

**CERTIFICATE OF SERVICE**

I hereby certify that on April 4, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Nicholas Mathews  
Nicholas Mathews